

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,
STATE OF CALIFORNIA, STATE OF
COLORADO, STATE OF ILLINOIS,
STATE OF INDIANA, STATE OF
IOWA, STATE OF MINNESOTA,
STATE OF NEBRASKA, STATE OF
OREGON, STATE OF TENNESSEE,
STATE OF TEXAS, STATE OF
WASHINGTON, and STATE OF
WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,
SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION,
LLC, and CORTEVA, INC.,

Defendants.

Case No. 1:22-cv-00828-TDS-JEP

IN RE CROP PROTECTION PRODUCTS
LOYALTY PROGRAM ANTITRUST
LITIGATION

Case No: 1:23-md-3062-TDS-JEP

Defendants Syngenta Crop Protection AG, Syngenta Corporation, Syngenta Crop Protection, LLC, and Corteva, Inc. hereby jointly move the court to enter the attached Defendants' Proposed Fact Discovery Coordination Order.

Defendants certify that consistent with Local Rule 37.1(a) that they have conferred with opposing counsel in both above-captioned matters on the content of the coordination order regularly over a period of several days with numerous attorneys involved, and have

resolved everything but those issues raised by the Parties' cross-motions. The Parties make their cross-motions for entry of coordination orders submitted by Plaintiffs and Defendants, respectively, under Local Rule 37.1(b) and agree that the issues raised in these cross-motions can be ruled on in an in-court hearing of no more than 1 hour. Specifically, the Parties agree that these cross-motions can be ruled on at the conference scheduled for May 23, 2024, consistent with the Court's May 2, 2024, order.

Dated: May 21, 2024

Respectfully submitted,

/s/ Patrick M. Kane

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*Specially appearing under L.R. 83.1(d)

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